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November 13, 2019

*Via ECF*

Hon. Vincent S. Broderick, United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: USA v. Pinkney, et. al.  
Docket No. 19-Cr-12 (VSB)**

Dear Judge Broderick:

I am writing on behalf of all defendants to request a postponement of the motion filing date and the trial date in this matter. We are making this request because many of the defendants are either in the midst of negotiations with the Government regarding a disposition, or are awaiting confirmation that particular defendants will be accepted into the YAO Program. Given this, and our desire to avoid unnecessary motion practice or pre-trial preparation, and the Government's desire not to conduct multiple trials, we are respectfully requesting that the trial be postponed until a date in early March, 2020, and that the motion deadline be extended likewise. If convenient for the Court, we propose either March 2, 2020 or March 9, 2020 for trial, and January 6 or 13, 2020 for a revised motion deadline.

All defendants concur with this request, and the Government has no objection. Thank you for your consideration in this matter.

Very truly yours,

-S-

David K. Bertan  
Jacqueline Cistaro

DKB

The parties are directed to appear for a status conference on November 21, 2019 at 11:00 a.m.

**SO ORDERED:**

*Vernon Broderick*  
HON. VERNON S. BRODERICK 11/13/2019  
UNITED STATES DISTRICT JUDGE